

**PHYSICAL THERAPY BOARD OF CALIFORNIA**

14 18 HOWE AVENUE, SUITE 16, SACRAMENTO, CA 95825-3204

TELEPHONE (916) 263-2550 FAX (916) 263-2560

INTERNET <http://www.ptb.ca.gov>

January 25, 2002

Kathleen La Count  
1400 Magnolia Ave.  
Manhattan Beach, CA 90266

Citation No. 01-02-0017

License No. PT 17714

**CITATION**

Investigation of a recently submitted complaint has revealed actions taken by you which violate sections of the law regulating the practice of physical therapy. A Citation is hereby issued to you in accordance with Section 125.9 of the Business and Professions Code for the violations described below.

**FIRST CAUSE FOR CITATION**

The investigation conducted by the Department of Consumer Affairs, Division of Investigation confirmed that you practiced physical therapy without a valid California license during the period on or about September 30, 1999 through October 2, 2000 and was compensated for said services. Based on these facts, you were in violation of:

1. Section 2630 of the B&P

It is unlawful for any person or persons to practice or offer to practice, physical therapy in this state for compensation received or expected, or to hold himself or herself out as a physical therapist, unless at the time of so doing the person holds a valid, unexpired, and unrevoked license issued under this chapter.

**ORDER**

Further, **you are ordered to pay a fine of \$1,500** to the Physical Therapy Board of California within 30 days after receipt of this Citation.

If you wish to contest all or any part of this Citation, complete the enclosed "Notice of Appeal -Request for Informal Conference" form and return it to this office within 10 days after receipt of this Citation. The date indicated on the order of abatement will be held in abeyance only for any violation(s) you wish to contest. The time to correct all uncontested violations will be adhered to as specified. In the alternative, you may, within 30 days after receipt of this Citation, request a formal administrative hearing before an administrative law judge under the Administrative Procedure Act.

Citation No. 01-02-1700

Kathleen La Count

Page 2

**FAILURE TO RETURN THE REQUEST FOR INFORMAL CONFERENCE FORM OR  
TO REQUEST AN ADMINISTRATIVE HEARING WITHIN THE TIMES INDICATED  
WILL WAIVE YOUR RIGHT TO ADMINISTRATIVELY CONTEST OR APPEAL THIS  
CITATION.**

Administrative Fine

\$ 1,500.00

FOR YOUR PROTECTION AND TO ASSURE PROPER CREDIT,  
PLEASE RETURN THE COPY OF THE CITATION  
AND NOTE THE CITATION NUMBER ON YOUR CHECK  
OR MONEY ORDER.

January 25, 2002

Date

Original Signed By:

STEVEN K. HARTZELL

Executive Officer

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INTERNET <http://www.ptb.ca.gov>**ORDER OF ABATEMENT**

January 25, 2002

Citation Against: Kathleen La Count

Citation No. 01-02-0017

Item No. 1Violations: Business and Professions Code Section 2630 .Description:

It is unlawful for any person or persons to practice or offer to practice, physical therapy in this state for compensation received or expected, or to hold himself or herself out as a physical therapist, unless at the time of so doing the person holds a valid, unexpired, and unrevoked license issued under this chapter.

Order of Correction

You are hereby ordered to abate this violation immediately and to cease and desist from further violation.

Failure to comply with the provisions of this Citation and Order of Abatement within 30 days of receipt may result in further legal action.